

EXHIBIT L

From: de Gramont, Alexandre
Sent: Tuesday, July 11, 2023 4:47 PM
To: Jason Carter
Cc: Levander, Andrew; Liu, Angela; Aviles Alfaro, Anna
Subject: RE: Letter re CSU Diploma(s) for Mr. Bola A. Tinubu
Attachments: Subpoena and Schedule A.pdf

Dear Mr. Carter,

Thank you for your email below. To be clear, we are simply seeking information about documents that are already in the public record and that have CSU's name on them—including CSU's position on whether the documents are authentic.

However, given time constraints in connection with the Nigerian proceedings, we have obtained a subpoena from the Cook County Circuit Court, as attached hereto. As you will see, the subpoena requires CSU to provide a representative to provide testimony on the topics set forth in Schedule A on Friday, July 21, 2023, at 9:00 am, at Dechert's offices in Chicago. If you have concerns regarding particular topics, we are willing to discuss them with you. We are also willing to show some flexibility as to the time and date of the deposition, so long as it takes place next week. That is, we can push the date up, but not back. Again, that is due to time constraints in connection with the Nigerian proceedings.

We trust the issuance of the subpoena will address any concerns that CSU has in connection with FERPA. We understand that CSU has previously provided similar information in response to Cook County Circuit Court Subpoenas.

We have taken steps to serve the subpoena on CSU through a process server, but please let us know if you will accept service of the subpoena via this email.

On a related topic, it has been reported in the press that your colleague, Jamar C. Orr, Esq., submitted a certification along with certain documents in the Nigerian proceedings. If that is correct, please let us know if CSU is willing to produce the certification and documents on a voluntary basis, or if we will need to undertake other means to obtain them.

Please do not hesitate to contact me if you want to discuss any of these matters.

Very truly yours,

Alexandre de Gramont
Partner

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+1 202 261 3082 Fax

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From: Jason Carter <jcarte40@csu.edu>
Sent: Monday, July 10, 2023 4:40 PM
To: de Gramont, Alexandre <Alexandre.deGramont@dechert.com>
Cc: Levander, Andrew <andrew.levander@dechert.com>; Liu, Angela <Angela.Liu@dechert.com>; Aviles Alfaro, Anna <Anna.AvilesAlfaro@dechert.com>
Subject: Re: Letter re CSU Diploma(s) for Mr. Bola A. Tinubu

[EXTERNAL EMAIL]

Alexandre,

I am in receipt of your email. As I am sure you are aware, the University is not required under FOIA to answer interrogatories or draft responses to questions. We have done in relation to this matter as a courtesy narrowly as it relates to the certification of records.

As you may also know, FERPA prevents the University from discussing student records with anyone other than the student or the individual designated by the student as a rightful recipient of the records. Absent a FERPA release, we are unable to discuss any matters related to the student record with you. If you are able to acquire a FERPA release, please provide it and a copy of the students identification documentation and we can produce the requisite records, if any exist.

On Mon, Jul 10, 2023 at 4:30 PM de Gramont, Alexandre <Alexandre.deGramont@dechert.com> wrote:

Dear Mr. Carter:

My law firm represents Mr. Atiku Abubakar, who was the candidate of Nigeria's principal opposition party (the Peoples' Democratic Party) in the February 2023 Presidential elections. I am attaching a letter, with Exhibits A-C, requesting the assistance of Chicago State University (CSU) in answering several questions about certain documents purporting to be CSU records, which have been submitted in Nigerian proceedings related to the Presidential elections.

As stated in the letter, we would prefer to proceed on an amicable and cooperative basis, without the need for subpoenas or other legal processes. At the same time, it is critical that we get to the bottom of these matters as soon as possible. We respectfully request that you or one of your colleagues review these materials and revert to us as soon as possible. As also stated in the letter, we are available for a telephone or video conference early this week. We could also arrange for a meeting with lawyers from our Chicago office if that is preferable for you.

We look forward to your prompt response.

Very truly yours,

Alexandre de Gramont

Partner

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This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments. Thank you.

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Respectfully,



Jason L. Carter, Esq.
General Counsel, Chief Compliance Officer & VP of Legal Affairs
9501 S. King Dr., Chicago, Illinois 60628

Cook Administration Building, ADM 318
Phone: (773) 995-3524 Fax: (773) 995-2462

FILED
7/11/2023 3:01 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2023L006854
Calendar, B
23485943

Subpoena in a Civil Matter (For Testimony and/or Documents)**(12/01/20) CCG 0106 A****IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

Atiku Abubakar

Plaintiff/Petitioner

v.

Chicago State University

Defendant/Respondent

2023L006854

Case No.

**SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)**

To: Chicago State University, Admin Rm 128
9501 South King Drive, Chicago IL 60628

1. ☐ YOU ARE COMMANDED to appear to give your testimony before the

Honorable _____ in Room _____ ,

_____, Illinois on _____

at _____ ☐ AM ☐ PM

2. ☒ YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public

at: Dechert LLP, 35 West Wacker Dr., Ste 3400, _____ in Room _____ ,

Chicago _____, Illinois on 7/21/23

at 9:00 ☒ AM ☐ PM

3. YOU ARE COMMANDED to mail the following documents in your possession or control

to _____ at _____ ,

on or before _____ at _____ ☐ AM ☐ PM

(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☐ Description continued on attached page(s).

Your failure to respond to this subpoena will subject you to punishment for contempt of this Court.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
[cookcountyclerkofcourt.org](https://www.cookcountyclerkofcourt.org)

Subpoena in a Civil Matter (For Testimony and/or Documents)**(12/01/20) CCG 0106 B**

Notice to Deponent:

1. ☒ The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:
See Schedule A

- ☒ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

2. ☒ The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____ .
(Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

☒ Atty. No.: 6299353

☐ Pro Se 99500

Name: Angela M Liu

Atty. for (if applicable): _____

Issued by: /s/ Angela M Liu

Signature

☒ Attorney ☐ Clerk of Court

Address: 35 West Wacker, Suite 3400

City: Chicago

Date: 7/11/23

State: IL Zip: 60601

Telephone: 312-646-5816

Primary Email: angela.liu@dechert.com

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2),

to _____ by certified mail, return receipt requested

(Receipt # _____) on _____. I paid the witness \$ _____ for witness and mileage fees.

- ☐ I served this subpoena by handing a copy to _____

on _____. I paid the witness \$ _____ for witness and mileage fees.

/s/ _____

(Signature of Server)

(Print Name)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

SCHEDULE A

DEFINITIONS

The following definitions and instructions apply to each of the Topics and are deemed incorporated therein:

1. “And” and “or” shall be construed both disjunctively and conjunctively in order to bring within the scope of these topics that might otherwise be construed to be outside their scope.
2. “Any” and “all” shall be construed to mean “any and all.”
3. “Communication” shall mean any transfer of information of any type, written, oral, electronic, or otherwise.
4. “Document” shall be interpreted in the broadest sense and includes, but is not limited to, all written, printed, photocopied, computer generated, or electronically transmitted materials, including e-mails, attachments to e-mails, voicemails, writings, publications, messages, communications, facsimiles, computer tapes, microfilm or microfiche, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained and translated if necessary, by You into reasonably useable and searchable form, including information in native format. A draft or non-identical copy is considered a separate document. The term “document” includes generally any kind of document that is now, or formerly was, in Your possession, custody or control, or that was known to You to exist, or that You can locate or discover by reasonably diligent efforts.
5. “Including” shall mean including but not limited to.
6. “Tinubu” shall mean Bola Ahmed Tinubu, date of birth alleged to be 03/29/1952 and Social Security No. appearing in publicly filed documents as 321-06-0595 or 213-06-0595.

7. “Date” means the exact day, month and year if ascertainable, or if not, the best approximation (including relationship to other events).

8. “Refer,” “relate to,” “regard,” “arising out of,” “concerning,” “reflecting,” “addressing,” and their cognates shall be understood in their broadest sense, and include, in each instance, identifying, evidencing, summarizing, commenting upon, referring to, describing, digesting, reporting, listing, analyzing, studying, discussing, stating, setting forth, reflecting, interpreting, concerning, recording, including, supporting, negating, contradicting, manifesting, containing, constituting, comprising, or resulting from the subject matter identified.

9. “Policy” or “Policies” means policies, procedures, practices, guidelines, protocols, programs, or systems.

10. “University” shall mean the Chicago State University, and any of its directors, members, managers, employees, representatives, agents, attorneys, consultants, or anyone acting on behalf of any of the foregoing persons.

11. “You” or “Your” shall mean the University.

TOPICS

1. Tinubu’s application for admission to the University.
2. The University’s acceptance of Tinubu as a student at the University.
3. Dates of attendance by Tinubu at the University as a student of the University.
4. Degrees, including awards and honors, attained by Tinubu from the University.
5. Courses taken by Tinubu at the University.
6. Location of University files relating to Tinubu.
7. Communications between the University and Tinubu or his representative inquiring about his attendance at the University.

8. The University's responses and other requests concerning Tinubu's records from the University.

9. The University's policies and practices regarding records requests.